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12 *Attorneys for Defendants*
13 *Unforgettable Coatings, Inc.*
14 *Unforgettable Coatings of Idaho LLC*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 JOSE ISMAEL ZUNIGA, on behalf of himself
18 and all others similarly situated,

Case No.: 2:21-cv-01221-JCM-VCF

19 Plaintiff,

20 **STIPULATION TO EXTEND DEADLINE**
FOR DEFENDANTS TO RESPOND TO
PLAINTIFF'S COMPLAINT

21 vs.

22 **(SIXTH REQUEST)**

23 UNFORGETTABLE COATINGS INC.;
24 UNFORGETTABLE COATINGS OF IDAHO
25 LLC; DOES 1 through 50; inclusive.

26 Defendants.

27 IT IS HEREBY STIPULATED by and between Plaintiff Jose Ismael Zuniga, ("Plaintiff"),
28 through his counsel, Gabroy Law Offices, and Defendants, Unforgettable Coatings, Inc. and
29 Unforgettable Coatings of Idaho, LLC, ("Defendants"), by and through their counsel, Jackson
30 Lewis P.C., that Defendants shall have an extension up to and including December 8, 2021, in
31 which to file their respective responses to Plaintiff's Complaint. This Stipulation is submitted and
32 based upon the following:

33 1. Plaintiff filed his Complaint on May 25, 2021 in the Eighth Judicial District Court
34 of Clark County, Nevada, Case No. A-21-835257-C. The Summons and Complaint were served
35 on or about June 8, 2021.

36 2. Defendants' filed their Petition for Removal of Civil Action from State Court on
37 June 29, 2021.

1 3. Defendants' Answer is currently due November 8, 2021.

2 4. This is the sixth request for an extension of time for Defendants to file a response
3 to Plaintiff's Complaint.

4 5. The parties are discussing a potential resolution of Plaintiff's claims, which would
5 render any such response unnecessary.

6 6. This request is made in good faith and not for the purpose of delay.

7 7. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed
8 as waiving any claim and/or defense held by any party.

9 Dated this 8th day of November, 2021.

10 GABROY LAW OFFICES

JACKSON LEWIS P.C.

11 */s/ Kaine Messer*

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13 Kaine Messer, State Bar No. 14240
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11 */s/ Holly E. Walker*

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17 *Attorneys for Plaintiff*

17 *Attorneys for Defendants*

18 **ORDER**

19 IT IS SO ORDERED.



20 *U.S. District/Magistrate Judge*

21 Dated: 11-9-2021